

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

In re: Lindell Management LLC Litigation

Case No. 23-cv-1433 (JDT/DJF)

JUDGMENT DEBTOR'S
MEMORANDUM IN SUPPORT OF
ITS REQUEST FOR AN
EXTENSION OF TIME TO FILE
RESPONSES TO POST-JUDGMENT
DISCOVERY

Rule 6 F.R.Civ.P. provides, in regard to computation and extension of time to act under the rules:

(b) Extending Time.

(1) In General. When an act may or must be done within a specified time, the court may, for good cause, extend the time:

(B) on motion made after the time has expired if the party failed
to act because of excusable neglect.

Defendant asserts that the reasons set forth in the attached Declaration of Debtor's Counsel in Support of Motion to Extend Time to Respond to Post-Judgment Discovery set out sufficient bases for granting the requested relief. No harm will come to the plaintiff by granting the motion.

Respectfully submitted,

THOMAS F. MILLER, P.A.

Dated: May 6, 2024

BY

/s/ Thomas F. Miller

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